

ICC Docket No. 01-0662  
Ameritech Illinois Ex. 4.1 (Cottrell)  
Schedule – 2/Part 2  
\*\*\*PUBLIC\*\*\*



215 S. WASHINGTON SQUARE, SUITE 200  
LANSING, MICHIGAN 48933-1816  
TELEPHONE: (517) 371-1730  
FACSIMILE: (517) 487-4700  
<http://www.dickinson-wright.com>

January 9, 2002

JOHN M. DEMPSEY  
[jdempsey@dickinson-wright.com](mailto:jdempsey@dickinson-wright.com)  
(517) 487-4763

**Via Hand Delivery**

Dorothy Wideman  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, MI 48909

**Re: In the matter, on the Commission's own motion, to consider  
AMERITECH MICHIGAN'S compliance with the competitive checklist  
in Section 271 of the federal Telecommunications Act of 1996.  
Case No. U-12320**

Dear Ms. Wideman:

Please find enclosed for filing an original and 15 copies of *Ameritech Michigan's Interim Report on the Line Loss Notification Issue* and *Proof of Service*.

Please note that the confidential materials enclosed should be filed under separate seal, and that this documentation constitutes trade secrets and commercial or financial information which cannot be disclosed to unauthorized persons without the consent of Ameritech pursuant to Section 210 of the 1991 P.A. 179, as amended by 1995 P.A. 216.

Further, as to the confidential exhibit, Ameritech Michigan will provide, upon request, information relating to each individual CLEC as shown on Confidential Attachment A.

If you should have any questions, please contact me. Thank you.

Very truly yours,

John M. Dempsey

JMD/mds  
Enclosures

C o u n s e l l o r s   A t   L a w

DETROIT   BLOOMFIELD HILLS   LANSING   GRAND RAPIDS   ANN ARBOR  
WASHINGTON, D.C.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,       )  
to consider Ameritech Michigan's compliance       )  
with the competitive checklist in Section 271 of       ) Case No. U-12320  
the federal Telecommunications Act of 1996.       )  
\_\_\_\_\_)

PROOF OF SERVICE

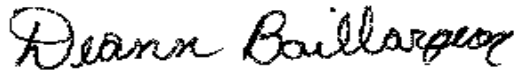
STATE OF MICHIGAN       )  
  ) ss.  
COUNTY OF INGHAM       )

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on January 9, 2002, she served a copy of ***Ameritech Michigan's Interim Report on the Line Loss Notification Issue*** upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.



\_\_\_\_\_  
Mindy D. Smith

Subscribed and sworn to before me,  
a Notary Public in and for said County,  
this 9th day of January, 2002.



\_\_\_\_\_  
Deann Baillargeon, Notary Public  
Ingham County, Michigan  
My Commission Expires: 2/16/03

**SERVICE LIST – MPSC CASE NO. U-12320**

<b><u>MCLEODUSA</u></b> William R. Ralls Leland R. Rosier Clark Hill PLC 2455 Woodlake Circle Okemos, MI 48864 Phone: (517) 381-9193 Fax: (517) 381-0268 Email: <a href="mailto:Williamrralls@aol.com">Williamrralls@aol.com</a> <a href="mailto:Lrosier@clarkhill.com">Lrosier@clarkhill.com</a>  Brad Kruse McLeodUSA 6400 C Street SW Cedar Rapids, IA 52406-3177 Phone: (319) 790-7939 Fax: (319) 790-7901 Email: <a href="mailto:bkruse@mcleodusa.com">bkruse@mcleodusa.com</a> <a href="mailto:Csharp@mcleodusa.com">Csharp@mcleodusa.com</a> <a href="mailto:Jladage@mcleodusa.com">Jladage@mcleodusa.com</a>	<b><u>SPRINT COMMUNICATIONS CO., L.P.</u></b> Roderick S. Coy Haran C. Rashes Clark Hill PLC 2455 Woodlake Circle Okemos, MI 48864 Phone: (517) 381-9193 Fax: (517) 381-0268 Email: <a href="mailto:rcoy@clarkhill.com">rcoy@clarkhill.com</a> <a href="mailto:Hrashes@clarkhill.com">Hrashes@clarkhill.com</a>  <b><u>ATTORNEY GENERAL</u></b> Orjiakor N. Isiogu Assistant Attorney General Special Litigation Division 6520 Mercantile Way, Suite 2 Lansing, MI 48909 Phone: (517) 373-1123 Fax: (517) 373-9860 Email: <a href="mailto:isioguo@ag.state.mi.us">isioguo@ag.state.mi.us</a>
<b><u>MPSC STAFF</u></b> Steven D. Hughey Assistant Attorney General Public Service Division 6545 Mercantile Way, Suite 15 Lansing, MI 48911 Phone: (517) 334-7650 Fax: (517) 334-7655 Email: <a href="mailto:hugheys@ag.state.mi.us">hugheys@ag.state.mi.us</a>	<b><u>XO MICHIGAN INC.</u></b> Michael S. Ashton 1000 Michigan National Tower Lansing, Michigan 48933 Phone: (517) 482-5800 Fax: (517) 482-0887 Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a>
<b><u>NEXTLINK MICHIGAN, INC.</u></b> Michael S. Ashton Fraser Trebilcock Davis & Foster, P.C. 1000 Michigan National Tower Lansing, MI 48933 Phone: (517) 482-5800 Fax: (517) 482-0887 Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a>	<b><u>TELECOMMUNICATIONS ASSOCIATION OF MICHIGAN</u></b> Harvey J. Messing Loomis, Ewert, Parsley, Davis & Gotting, P.C. 232 S. Capitol Ave., Suite 1000 Lansing, MI 48933 Phone: (517) 482-2400 Fax: (517) 482-7227 Email: <a href="mailto:hjmessing@loomislaw.com">hjmessing@loomislaw.com</a>

<p><b><u>AT&amp;T COMMUNICATIONS OF MICHIGAN, INC. And TCG DETROIT</u></b></p> <p>Arthur J. LeVasseur Fischer, Franklin &amp; Ford Guardian Building, Suite 3500 500 Griswold Street Detroit, MI 48226 Phone: (313) 962-5210 Fax: (313) 962-4559 Email: <a href="mailto:artlev@voyager.net">artlev@voyager.net</a></p> <p>John J. Reidy, III AT&amp;T Communications 222 W. Adams, Suite 1500 Chicago, IL 60606 Phone: (312) 230-2647 Fax: (312) 977-8521 Email: <a href="mailto:jjreidy@att.com">jjreidy@att.com</a></p>	<p><b><u>WORLDCOM</u></b></p> <p>Albert Ernst Dykema Gossett PLLC 800 Michigan National Tower Lansing, MI 48933 Phone: (517) 374-9155 Fax: (517) 374-9191 Email: <a href="mailto:aernst@dykema.com">aernst@dykema.com</a></p> <p>James R. Denniston WorldCom 205 North Michigan Ave., Suite 3700 Chicago, IL 60601 Phone: (312) 470-6531 Fax: (312) 470-4929 Email: <a href="mailto:jdenniston@mcimail.com">jdenniston@mcimail.com</a></p>
<p><b><u>QWEST COMMUNICATION CORP and LCI INTERNATIONAL TELECOM CORP</u></b></p> <p>Michael S. Ashton Fraser Trebilcock Davis &amp; Foster, P.C. 1000 Michigan National Tower Lansing, MI 48933 Phone: (517) 482-5800 Fax: (517) 482-0887 Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a></p>	<p><b><u>CLEC ASSOCIATION OF MICHIGAN</u></b></p> <p>William R. Ralls Roderick S. Coy Clark Hill PLC 2455 Woodlake Circle Okemos, MI 48864 Phone: (517) 381-9193 Fax: (517) 381-0268 Email: <a href="mailto:Williamralls@aol.com">Williamralls@aol.com</a> <a href="mailto:Rcoy@clarkhill.com">Rcoy@clarkhill.com</a></p>
<p><b><u>AIRTOUCH CELLULAR, INC.</u></b></p> <p>Roderick S. Coy Thomas E. Maier Clark Hill PLC 2455 Woodlake Circle Okemos, MI 48864 Phone: (517) 381-9193 Fax: (517) 381-0268 Email: <a href="mailto:rcoy@clarkhill.com">rcoy@clarkhill.com</a> <a href="mailto:Tmaier@clarkhill.com">Tmaier@clarkhill.com</a></p>	<p><b><u>TELIGENT, INC.</u></b></p> <p>William R. Ralls Leland R. Rosier Clark Hill PLC 2455 Woodlake Circle Okemos, MI 48864 Phone: (517) 381-9193 Fax: (517) 381-0268 Email: <a href="mailto:Williamralls@aol.com">Williamralls@aol.com</a> <a href="mailto:Lrosier@clarkhill.com">Lrosier@clarkhill.com</a></p>

<p><b><u>TRA</u></b>  Andrew O. Isar  Director – State Affairs  Telecommunications Resellers Association  3220 Uddenberg Lane, Suite 4  Gig Harbor, WA 98335  Phone: (253) 851-6700  Fax: (253) 851-6474  Email: <a href="mailto:aisar@harbor-group.com">aisar@harbor-group.com</a></p>	<p><b><u>COVAD COMMUNICATIONS COMPANY</u></b>  Albert Ernst  Leonard C. Wolfe  800 Michigan National Tower  Lansing, Michigan 48933  Phone: (517) 374-9100</p>
<p><b><u>PRISM MICHIGAN OPERATIONS. LLC</u></b>  Julie Kaminski  Prism Communication Services, Inc.  1667 K Street, N.W.  Suite 200  Washington, D.C. 20006  Phone: (202) 263-7962  Fax: (202) 263-7978  Email: <a href="mailto:jkaminski@prismcsi.net">jkaminski@prismcsi.net</a></p>	<p><b><u>BUILDING COMMUNICATIONS, INC.</u></b>  Michelle E. Vocht  Lynn H. Shecter  Roy, Shecter &amp; Vocht, P.C.  36700 Woodward Ave., Ste. 205  Bloomfield Hills, MI 48304  Phone: (248) 540-7660  Fax: (248)  Email: <a href="mailto:vocht@rsmv.com">vocht@rsmv.com</a>  <a href="mailto:Shecter@rsmv.com">Shecter@rsmv.com</a></p>
<p><b><u>WINSTAR WIRELESS OF MICHIGAN, INC.</u></b>  William R. Ralls  Leland R. Rosier  Clark Hill, PLC  2455 Woodlake Circle  Okemos, MI 48864-5941  (517) 381-9193  (517) 381-0268  Email: <a href="mailto:Williamrralls@aol.com">Williamrralls@aol.com</a>  <a href="mailto:Lrosier@clarkhill.com">Lrosier@clarkhill.com</a></p>	<p><b><u>MICHIGAN CABLE TELECOMMUNICATIONS ASSOC.</u></b>  David E.S. Marvin  Fraser Trebilcock Davis &amp; Foster, P.C.  1000 Michigan National Tower  Lansing, MI 48933  Phone: (517) 482-5800  Fax: (517) 482-0887  Email: <a href="mailto:dm Marvin@ftdf.com">dm Marvin@ftdf.com</a></p>
<p><b><u>COAST TO COAST TELECOMMUNICATIONS, INC.</u></b>  Roderick S. Coy  Haran C. Rashes  Clark Hill PLC  2455 Woodlake Circle  Okemos, MI 48864  Phone: (517) 381-9193  Fax: (517) 381-0268  Email: <a href="mailto:rcoy@clarkhill.com">rcoy@clarkhill.com</a>  <a href="mailto:Hrashes@clarkhill.com">Hrashes@clarkhill.com</a></p>	<p><b><u>LONG DISTANCE OF MICHIGAN, INC.</u></b>  Roderick S. Coy  Haran C. Rashes  Clark Hill, PLC  2455 Woodlake Circle  Okemos, MI 48864-5941  Phone: (517) 381-9193  Fax: (517) 381-0268  Email: <a href="mailto:rcoy@clarkhill.com">rcoy@clarkhill.com</a>  <a href="mailto:Hrashes@clarkhill.com">Hrashes@clarkhill.com</a></p>

**MEDIAONE TELECOMMUNICATIONS  
OF MICHIGAN, INC.**

Roderick S. Coy  
Haran C. Rashes  
2455 Woodlake Circle  
Okemos, MI 48864-5941  
Phone: (517) 381-9193  
Fax: (517) 381-0268  
Email: [rcoy@clarkhill.com](mailto:rcoy@clarkhill.com)  
[Hrashes@clarkhill.com](mailto:Hrashes@clarkhill.com)

Timothy P. Collins  
MediaOne Telecomm. of Michigan, Inc.  
29777 Telegraph, Suite 4400B  
Southfield, MI 48034  
Email: [tcollins@mediaone.com](mailto:tcollins@mediaone.com)

**CORECOMM MICHIGAN, INC.**

William R. Ralls  
Leland R. Rosier  
Clark Hill, PLC  
2455 Woodlake Circle  
Okemos, MI 48864-5941  
Phone: (517) 381-9193  
Fax: (517) 381-0268  
Email: [Williamrralls@aol.com](mailto:Williamrralls@aol.com)  
[Lrosier@clarkhill.com](mailto:Lrosier@clarkhill.com)

Thomas O'Brien  
CoreComm Michigan, Inc.  
450 West Wilson Bridge Road  
Worthington, OH 43085  
Phone: (614) 430-5101  
Fax: (614) 847-4393  
Email: [thomas.o'brien@corecomm.com](mailto:thomas.o'brien@corecomm.com)

**COMPTel**

Robert J. Aamoth  
Andrew M. Klein  
Daniel M. Steinway  
Kelley, Drye & Warren LLP  
1200 Nineteenth Street, NW, Suite 500  
Washington, D.C. 20036  
Phone: (202) 955-9600  
Fax: (202) 955-9792  
Email: [raamoth@kellydrye.com](mailto:raamoth@kellydrye.com)  
[Aklein@kellydrye.com](mailto:Aklein@kellydrye.com)  
[Dsteinway@kellydrye.com](mailto:Dsteinway@kellydrye.com)

Terry Monroe  
Vice President, State Affairs  
The Competitive Telecommunications  
Association (CompTel)  
1900 M Street, N.W., Suite 800  
Washington, D.C. 20036  
Phone: (202) 296-6650  
Fax: (202) 296-7585  
Email: [tmonroe@comptel.org](mailto:tmonroe@comptel.org)

**MICHIGAN PAY TELEPHONE ASSOC.**

William R. Ralls  
Leland R. Rosier  
Clark Hill PLC  
2455 Woodlake Circle  
Okemos, MI 48864  
Phone: (517) 381-9193  
Fax: (517) 381-0268  
Email: [Williamrralls@aol.com](mailto:Williamrralls@aol.com)  
[Lrosier@clarkhill.com](mailto:Lrosier@clarkhill.com)

<p><b><u>Z-TEL COMMUNICATIONS, INC.</u></b>  Michael S. Ashton  1000 Michigan National Tower  Lansing, Michigan 48933  Phone: (517) 482-5800  Fax: (517) 482-0887  Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a></p>	<p><b><u>FOCAL COMMUNICATIONS CORPORATION OF MICHIGAN</u></b>  Michael S. Ashton  1000 Michigan National Tower  Lansing, Michigan 48933  Phone: (517) 482-5800  Fax: (517) 482-0887  Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a></p> <p>Jan Van Duzer  Senior Counsel  Focal Communications Corporation of Michigan  200 N. LaSalle, Suite 1100  Chicago, IL 60601</p>
<p><b><u>IP COMMUNICATIONS</u></b>  Michael S. Ashton  1000 Michigan National Tower  Lansing, Michigan 48933  Phone: (517) 482-5800  Fax: (517) 482-0887  Email: <a href="mailto:mashton@ftdf.com">mashton@ftdf.com</a></p> <p>Howard J. Siegel  Howard Siegel  Vice President of Regulatory Policy  IP Communications Corporation  9430 Research Blvd.  Echelon II, Suite 120  Austin, Texas 78759  512/418-0376  781/394-6428 (fax)  Email: <a href="mailto:hsiegel@ip.net">hsiegel@ip.net</a></p>	<p><b><u>MICHIGAN CONSUMER FEDERATION</u></b>  Kathleen F. O'Reilly  414 "A" Street, Southeast  Washington, DC 20003  Phone: 202-543-5068  Email: <a href="mailto:kforeilly@igc.org">kforeilly@igc.org</a></p> <p>Rick Gamber  Michigan Consumer Federation  4990 Northwind Drive, Suite 225  East Lansing, MI 48823  Phone: 517-324-9930  Email: <a href="mailto:mcf@acd.net">mcf@acd.net</a></p>



**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission's own motion,       )  
to consider Ameritech Michigan's compliance       )  
with the competitive checklist in Section 271 of       )       Case No. U-12320  
the federal Telecommunications Act of 1996.       )  
\_\_\_\_\_)

**AMERITECH MICHIGAN'S INTERIM REPORT**  
**ON THE LINE LOSS NOTIFICATION ISSUE**

Ameritech Michigan<sup>1</sup> submits the following report on line loss notifications as required by the Commission's December 20, 2001 Opinion and Order ("Order") in this docket. The Order required Ameritech Michigan to file "a comprehensive report" to include the following information: (1) the success of Ameritech Michigan's efforts to date to resolve the issue; (2) the numbers of affected customers; (3) timeframes in which CLECs may expect notification; and (4) confirmation that Ameritech Michigan has provided notice to affected customers explaining that any dual billing is not the fault of the CLEC.

---

<sup>1</sup> Michigan Bell Telephone Company d/b/a Ameritech Michigan, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications, Inc. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein) pursuant to assumed name filings with the state of Michigan.

## **I. AMERITECH MICHIGAN'S EFFORTS TO DATE**

As stated in its response filed on December 14, 2001 in this docket, Ameritech Michigan first received current information about this issue<sup>2</sup> at the end of September and early October, from one CLEC, WorldCom. Ameritech Michigan proceeded as quickly as possible to investigate the alleged problem and, once verified, to devise solutions. The investigation determined that an issue existed with a lack of line loss notification on some CLEC to CLEC migration orders and on some "Winback" orders. More CLECs were involved besides WorldCom.

As a result of the investigation, Ameritech Michigan took several remedial steps. It immediately did a root cause analysis and began the process to correct the situation, which included: identifying those orders that failed to receive loss notifications; generating electronic loss notifications for those orders; and, communicating the results to the involved CLECs. Additionally, Ameritech Michigan formed a cross-functional team to perform an end to end review of the processes involved. Causes identified for the lack of notification were not OSS-related; rather, certain information necessary to generate the notification was not being entered into the database. The methods and procedures (M&P) for service representatives on line loss

---

<sup>2</sup> Line Loss Notifiers are those electronic messages sent to a CLEC that uses Ameritech's facilities to provide service to its end users to notify that CLEC that an end user has changed providers. The end user may have chosen another CLEC to provide its basic local exchange service (also known as "CLEC to CLEC Migrations") or may have chosen Ameritech to provide its basic local exchange service (also known as "Winback"). When an end user makes such a choice, the "losing" CLEC is notified of its loss. As that CLEC solely used Ameritech's facilities, i.e., the Unbundled Network Element Platform (UNE-P) or resold basic local exchange services, Ameritech has taken on the responsibility to notify the losing CLEC of its end user's choice to subscribe to a different carrier's basic local exchange service.

notification was either not completely clear or was not being followed in all cases. To address these problems, service representatives underwent retraining to ensure they are familiar with the requirement to code orders accurately so as to generate a line loss notification. The M&P was also revised to ensure its clarity and accuracy. This entire process is discussed in greater detail below.

Ameritech's Mechanized Order Receipt ("MOR") system requires that New ("N") and Disconnect ("D") order information is present within the database in order to initiate line loss notifications. Once MOR receives a "completion notification" from the Ameritech Service Order Negotiator (ASON), MOR compares the completion notification's order number and reseller information with the "D" order information that was entered into the Mechanized Order Receipt/Telemanagement ("MOR/TEL") database by the Local Service Center ("LSC") service representative. MOR performs this comparison to determine if a line loss notification needs to be generated. Thus, it is critical that the N and D order information be entered for such notifications to be generated.

Two scenarios were identified as involving missing line loss notifications for CLEC to CLEC and Winback orders; the process of identification and correction was begun first with WorldCom. In the first scenario, "N" orders for Winbacks were not entered into the MOR/TEL database prior to MOR receiving the completion notice from ASON. The MOR Information Technology ("IT") support team developed and executed programs to identify the Winback orders for which line loss notifications were not sent. These orders were then processed through the normal MOR production process to generate the missing line loss notifications. In the second scenario, "N" orders for CLEC to CLEC migrations and Winbacks were manually entered into the MOR/TEL database. However, the "D" order was not entered. The MOR IT

support team developed and executed a program to identify all Winback and CLEC to CLEC migration orders for which an “N” order was entered into the MOR/TEL database with no corresponding “D” order number. A match was then performed on the “billing telephone number” of those “N” orders to the “billing telephone number” of the “D” order completion notice received from ASON. Orders that were missing line loss notifications were then processed through the normal MOR production process to generate the missing notifications. Where line loss notifications could not be programmatically generated due to missing information, the LSC undertook a manual investigation of each identified order and, where data was available, provided data to IT so that the missing line loss notifications could be sent electronically to the CLEC (in this specific case, WorldCom).<sup>3</sup>

In reviewing both situations (“CLEC to CLEC” and “Winback”), Ameritech identified two separate M&P issues that appear to be root causes of the missing line loss notifications.

The first M&P issue served as a root cause of the missing line loss notifications under “Winback” situations and was determined to be a timing issue within one step of the process. In order for the line loss notification process to work as designed, there must be a record present in the MOR/Tel system prior to the completion of the order in the Ameritech Customer Information System (ACIS). In some instances, the LSC, which is responsible for entering CLEC requests into the MOR/Tel system in a “Winback” situation, was not creating this MOR/Tel record prior to the order completion in ACIS. As soon as this situation was identified

---

<sup>3</sup> Other carriers (other than WorldCom) previously raised the issue of missing line loss notifiers, and Ameritech responded to those carriers. In his July 30, 2001 Reply Affidavit in the Checklist Informational Filing in this docket, Mr. Mark Cottrell described the issue as raised by Z-Tel and Ameritech’s response. These carriers were willing to receive special reports via fax to address their missing line loss notifiers.

as an issue, all service representatives responsible for this type of activity were immediately covered. That coverage occurred during the latter half of October 2001.

The second M&P issue that was identified as a root cause of missing line loss notifications occurred under “CLEC to CLEC” situations. As noted above, this root cause was also determined to be an M&P issue that was associated with the information that was necessary to enter into MOR/Tel. In fact, this situation dealt with a certain category of “CLEC to CLEC” migration situations where the two CLECs used unique product offerings to provide service to an end user. Once identified, the M&P was immediately corrected, and all service representatives issuing these types of orders were covered. This training also occurred in October of 2001.

In order to address this issue more broadly, and to determine if there may be other causes of missing line loss notifications, Ameritech has formed a cross-functional team with members from Product Management, IT, LSC, and Account Management to review the overall line loss notification process for CLECs who solely use Ameritech’s facilities to provide service to their end users. This is an end to end review of Ameritech processes in order to determine whether any other potential root causes can be identified. The members of the cross-functional team are actively engaged in further root cause analysis. They are flow-charting all processes, analyzing each sub-component, and investigating all possibilities to explain why any remaining line loss notifications are not generated as they should be. The team is identifying any further root causes and outlining corrective actions along with a timetable for their completion. Additionally, this review will assure that missing notifications can be generated, and will also assure that new processes are in place (whether in systems or at the LSC) to prevent the situation from recurring. This process is a complicated one and, in order to be thorough, involves an extensive amount of time and resources. Ameritech Michigan will provide the Commission and

the CLECs with further information after this intensive review process is concluded, and at a minimum it will file a supplemental comprehensive report in 20 days.

In the interim, Ameritech is continuing to scan its systems for orders that are missing line loss notifications, as had been done to correct the embedded base described above. Ameritech Michigan continues to regard the problem as a very serious one. The action plan described above is expected to provide ultimately successful solutions.

## **II. NUMBERS OF AFFECTED CUSTOMERS**

Attachment A to this report contains a listing of the CLECs that experienced missing line loss notifications since January 2001. The report shows, by CLEC, the total number of missing line loss notifications identified, the number that have already been generated to the CLEC, and the number still to be generated to the CLEC. Because the data is customer proprietary information, the public version of the attachment shows the total for each category. The confidential version of the attachment is being filed under separate cover and provided to the CLECs based on procedures previously employed in this docket.

## **III. TIMEFRAMES WITHIN WHICH CLECS MAY EXPECT NOTIFICATION**

The Order required Ameritech Michigan to report on the timeframes within which CLECs may expect to receive notification. All affected CLECs will be notified of the missing line loss notifications by no later than January 16, 2002. Beginning after notice to the CLEC has been give, Ameritech Michigan will use its normal OSS processes to generate the line loss notifications to the CLEC. Ameritech Michigan anticipates that all missing line loss

notifications will be generated by no later than February 8, 2002. Ameritech Michigan has dedicated resources to ensure an expeditious return of all missing line loss notifications; the schedule set forth here assures adequate time is allowed for any manual investigation that must be completed (as was described above).

#### **IV. NOTICE TO AFFECTED CUSTOMERS**

The Order specified that this report should "include confirmation that Ameritech Michigan has provided notice to affected customers that continued billing after the switch in providers was the fault of Ameritech Michigan, not either CLEC."

This aspect of the issue is not necessarily a straightforward one. First, it is very likely the case that CLECs are not inclined to permit Ameritech Michigan to communicate directly with their end user customers on any subject, even this one. It had not occurred to Ameritech Michigan, quite frankly, that such a unilateral communication would be appropriate. Furthermore, Ameritech Michigan does not have sufficient information on a CLEC's end user customers such that it can notify those end users of the information specified in the Order. In these situations, the end user is not a customer of Ameritech Michigan -- the customer of Ameritech Michigan is the CLEC. Although the information in Ameritech Michigan's databases may include a phone number and a service address, those databases do not likely possess the end user customer's identity or billing address (and, in the case of multiple service addresses where billing is centralized at one billing address, such account information would be especially critical for end user notices). Thus, it is not practicable (nor likely desirable from the CLECs' standpoint) for Ameritech Michigan to provide the notice to all end user customers contemplated in the Order.

Ameritech Michigan commits to working with the CLECs to address the Order's mandate. It will discuss with those CLECs who have end user customers on accounts where line loss notification was not provided to the previous CLECs the means for them to provide notification to their end user customers that any double billing is not the fault of either CLEC but, rather, because of the missing line loss notification. Part of this communication process will include providing a letter explaining the facts of the situation, and a copy of that letter is included with this report as Attachment B. Ameritech Michigan will provide this letter to affected CLECs by January 16, 2002.

Ameritech Michigan is also in the process of notifying its current end user customers who have switched from a CLEC to Ameritech Michigan on accounts where line loss notification was not provided to that CLEC. Ameritech Michigan will notify these end user customers, for which it does have the requisite name and address information, that any dual billing by the affected CLEC is not the fault of that CLEC but due to the missing line loss notification. This notification is anticipated to be communicated via a bill page message that will appear on end user bills during February.

## **V. CONCLUSION**

Although this report provides the information required by the Order, Ameritech Michigan stands ready to work with the Commission and CLECs to further address line loss notification issues. As discussed above, and as discussed in the response filed in this docket on December 14, 2001, Ameritech Michigan takes this issue very seriously. It continues to work with the affected CLECs to provide them necessary and appropriate information on the issue; it has identified two root causes for the lack of line loss notifications and implemented corrective



measures to eliminate those causes; it has undertaken a cross-functional "soup-to-nuts" review of all relevant processes in order to determine why any additional missing line loss notifications have occurred or might occur in the future; and it commits to provide updated information to the Commission and CLECs on the issue regarding its continuing efforts to completely rectify the situation.

Ameritech Michigan specifically requests authorization to file a supplemental report within 20 days of the filing of this report in order to provide further information responsive to the Order. Ameritech Michigan consents to a delay in the deadline for CLECs to file a response commensurate with the interval provided in the Order for comments on this report.

Ameritech Michigan certainly appreciates the importance of this issue to end users and CLECs that are affected, as well as to the Commission. It is not treating the issue cavalierly, as was previously alleged;<sup>4</sup> it has committed extensive resources to solve the issue and is attempting to do so as expeditiously as possible.

---

<sup>4</sup> Ameritech Michigan notes that the Order did not agree with such allegations, which did not accurately reflect the company's diligent approach to the issue.

Respectfully Submitted,

Craig A. Anderson (P28968)  
AMERITECH MICHIGAN  
444 Michigan Avenue, Room 1750  
Detroit, Michigan 48226  
(313) 223-8033

DICKINSON WRIGHT PLLC

By: \_\_\_\_\_  
John M. Dempsey (P30987)  
Attorneys for Ameritech Michigan  
215 S. Washington Square, Suite 200  
Lansing, MI 48933-1816  
(517) 371-1730

Dated: January 9, 2002

LANSING 34060-104 291338

**Ameritech Michigan  
Line Loss Notification Report**

Public  
Attachment A

Period from 1/1/01 through 12/31/01<sup>1</sup>

<b>CLEC to CLEC Migrations</b>	<b>Total # 836s Not Generated Properly</b>	<b>Total # 836s Already Sent to CLEC</b>	<b>Remaining 836s to Be Sent to CLEC</b>
<b>Losing CLEC Name</b>			

<b>TOTALS</b>	<b>2908</b>	<b>500</b>	<b>2408</b>
---------------	-------------	------------	-------------

<b>WINBACK (CLEC to Ameritech MI Migrations)</b>	<b>Total # 836s Not Generated Properly</b>	<b>Total # 836s Already Sent to CLEC</b>	<b>Remaining 836s to Be Sent to CLEC</b>
<b>Losing CLEC Name</b>			

<b>TOTALS</b>	<b>21426</b>	<b>11504</b>	<b>9922</b>
---------------	--------------	--------------	-------------

<b>GRAND TOTALS</b>	<b>24334</b>	<b>12004</b>	<b>12330</b>
---------------------	--------------	--------------	--------------

<sup>1</sup> Numbers based on data as of 1-9-02

<sup>2</sup> This carrier received some missing line loss notifiers manually via spreadsheet during 2001.

To Whom It May Concern:

You may have experienced double billing after taking service from another Competitive Local Exchange Provider (CLEC). If so, please be advised that the continued billing from your previous local service provider resulted from SBC Ameritech Michigan process issues that hampered your previous local service provider from receiving a timely notice of your decision to change to another local service provider. Please be assured that SBC is taking the necessary steps to identify and correct its processes. Thank you for your understanding. This notice is being provided to you pursuant to the Michigan Public Service Commission's Order issued December 20, 2001 in Case No. U-12320.

**CLEC SPECIFIC LINE LOSS INFORMATION IS PROPRIETARY  
AND ONLY AVAILABLE IN THE  
CONFIDENTIAL VERSION OF THIS SCHEDULE**